

EXHIBIT C

From: Matthew DeOreo <mdeoreo@tacopinalaw.com>
Sent: Tuesday, February 14, 2023 12:13 PM
To: Matthew Craig; Alina Habba, Esq.; Michael Madaio; Peter Swift; Peter Gabra; Joe Tacopina; Chad Seigel
Cc: Roberta Kaplan; Joshua Matz; Shawn G. Crowley
Subject: RE: Carroll II IME of Plaintiff

This email was sent from outside the Firm.

Hi Matt,

One other thing. Dr. Lamoureux will record the evaluation sessions so that he may refer to them when writing his report.

Do you know if Feb 20 and 21 work for your client yet?



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From: Matthew DeOreo
Sent: Tuesday, February 14, 2023 10:47 AM
To: Matthew Craig <mcraig@kaplanhecker.com>; Alina Habba, Esq. <ahabba@habbalaw.com>; Michael Madaio <mmadaio@habbalaw.com>; Peter Swift <pswift@habbalaw.com>; Peter Gabra <pgabra@habbalaw.com>; Joe Tacopina <jtacopina@tacopinalaw.com>; Chad Seigel <cseigel@tacopinalaw.com>

Cc: Roberta Kaplan <rkaplan@kaplanhecker.com>; Joshua Matz <jmatz@kaplanhecker.com>; Shawn G. Crowley <scrowley@kaplanhecker.com>
Subject: RE: Carroll II IME of Plaintiff

Hi Matt,

Once you confirm that Feb. 20 and 21 dates are good, we will reserve a room at a court reporter's office. There will be no court reporter in the room obviously, we will just use it as a neutral location.



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From: Matthew DeOreo

Sent: Monday, February 13, 2023 5:35 PM

To: 'Matthew Craig' <mcraig@kaplanhecker.com>; 'Alina Habba, Esq.' <ahabba@habbalaw.com>; 'Michael Madaio' <mmadaio@habbalaw.com>; 'Peter Swift' <pswift@habbalaw.com>; 'Peter Gabra' <pgabra@habbalaw.com>; Joe Tacopina <jtacopina@tacopinalaw.com>; Chad Seigel <cseigel@tacopinalaw.com>

Cc: 'Roberta Kaplan' <rkaplan@kaplanhecker.com>; 'Joshua Matz' <jmatz@kaplanhecker.com>; 'Shawn G. Crowley' <scrowley@kaplanhecker.com>

Subject: RE: Carroll II IME of Plaintiff

Also, attached is the CV of Dr. Hayes.

Matthew DeOreo
Partner

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From: Matthew DeOreo
Sent: Monday, February 13, 2023 5:33 PM
To: Matthew Craig <mcraig@kaplanhecker.com>; Alina Habba, Esq. <ahabba@habbalaw.com>; Michael Madaio <mmadaio@habbalaw.com>; Peter Swift <pswift@habbalaw.com>; Peter Gabra <pgabra@habbalaw.com>; Joe Tacopina <jtacopina@tacopinalaw.com>; Chad Seigel <cseigel@tacopinalaw.com>
Cc: Roberta Kaplan <rkaplan@kaplanhecker.com>; Joshua Matz <jmatz@kaplanhecker.com>; Shawn G. Crowley <scrowley@kaplanhecker.com>
Subject: Carroll II IME of Plaintiff

Hi Matt,

See the attached CV of our psychiatric expert. He wishes to conduct the IME of your client on February 20 and 21. He believes it will be 16 hours of evaluation.

It will be in NYC, and we can agree on a neutral location. No attorneys shall be present.

Dr. Lamoureux will be assisted by psychologist Dr. Jill Hayes.

Please let me know if those dates work for your client.

Thanks

Matt

Matthew DeOreo
Partner

tacopina seigel trial lawyers

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